

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

IN RE: VALSARTAN, LOSARTAN, AND
IRBESARTAN PRODUCTS LIABILITY
LITIGATION,

MDL NO. 2875

HON. ROBERT B. KUGLER

THIS DOCUMENT RELATES TO:

*Marvella Ochs, et al. v. Hetero Drugs, Ltd.,
et al.*

Case No. 1:20-cv-00323

**NOTICE OF VIDEOTAPED DEPOSITION OF
ESTATE REPRESENTATIVE FOR PLAINTIFF MARVELLA OCHS**

PLEASE TAKE NOTICE that, in accordance with Rule 30 of the Federal Rules of Civil Procedure and the Fact Witness Deposition Protocol in this case (Case Management Order No. 20, Dkt. 632), Defendant Hetero Drugs Ltd. And Hetero Labs Ltd. will take the deposition upon oral examination of the Estate Representative for Marvella Ochs on November 19, 2021 at 9:00 a.m. EST at Hill Wallack LLP, 21 Roszel Road, Princeton, NJ 08540. Please take further notice that: the deposition will be conducted remotely, using audio-visual conference technology; the court reporter will report the deposition from a location separate from the witness; counsel for the parties will be participating from various, separate locations; the court reporter will administer the oath to the witness remotely; and the witness will be required to provide government-issued identification satisfactory to the court reporter, and this identification must be legible on camera. The deposition shall be videotaped and recorded stenographically, and will continue from day to day until completed before a person duly authorized to administer oaths who is not counsel of record or interested in the events of this case. The attorney contact for the deposition is:

Nakul Shah, Esq.
Hill Wallack LLP
21 Roszel Road
Princeton, NJ 08540
(609) 924-0808
nshah@hillwallack.com

Date: October __, 2021

Respectfully submitted,

/s/ Eric Abraham
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*Attorney for Defendant Hetero Labs Ltd. And
Hetero Drugs Ltd.*

CERTIFICATE OF SERVICE

I hereby certify that on this ___th day of October, 2021 a true and correct copy of the Notice of Videotaped Deposition of Estate Representative for Plaintiff Marvella Ochs was served upon the following via ECF, with copies to Counsel for Plaintiffs and all counsel of record by e-mail:

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